

## REMARKS

Applicants respectfully traverse and request reconsideration.

Claims 1, 5-12, 14-22, 25, 27 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Liu, et al. (hereinafter “Liu”) (“XWRAP: an XML-enabled wrapper construction system for Webinformation source”, Proceedings of the 16th International Conference on Data Engineering, Publication Date: 2000, pgs. 611-621) in view of Keith (Patent Number 6,629,097). Applicants have amended the claims to indicate that the knowledge container creator module creates at least a first data descriptor item and at least a second data descriptor item based upon a raw data item wherein the raw data is in a plurality of different formats. Applicants respectfully submit that this subject matter is described for example, in paragraphs 0037, 0038, and elsewhere. The knowledge container creator module links each of the plurality of raw data items to respective first descriptor items and second descriptor items. In addition, the second descriptor item is in the form of data access instructions that provides instructions on how to access the data in the raw data file. Among other advantages, the system may provide a knowledge container that may be searchable by a variety of current and future query systems and provides multiple representations of the same underlying raw data, thereby facilitating re-use of the knowledge by a variety of current and future systems. Other advantages will be recognized by those of ordinary skill in the art.

Neither Liu nor Keith contemplate such subject matter. The office action admits that Liu does not disclose raw data items or data representing data that is in a plurality of different formats. In addition, Keith, in the cited portion of col. 25, lns. 53-54 and col. 18, lns. 8-20, merely states that the different databases such as medical databases or law databases can be tapped for “input into the methods of the current invention”. However, as described, each data item is only in a single format in Keith. In other words, although different databases may be

accessed, the raw data such as the business section of the *New York Times* is all in a single format. In contrast, Applicants' claim that the raw data items are in a plurality of different formats. As shown for example in FIG. 6 and described elsewhere of Applicants' Specification, the single raw data item 110 can be in multiple formats, for example formatted data, unformatted data or data links. Accordingly, Keith does not teach what is alleged and the claims are in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

Applicants have added new claim 29 which finds support in at least paragraph 0053.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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